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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA, )  
v. )  
Plaintiff, )  
EDGAR OMAR HERRERA FARIAS ) 4:15-CR-6049-EFS-16  
(16), ) Joint Status Report  
Defendants. )

Plaintiff, United States of America, by and through Joseph Harrington, United States Attorney for the Eastern District of Washington, and Stephanie Van Marter, Assistant United States Attorney for the Eastern District of Washington, hereby submit the following Joint Status Report after receiving the Court's Text Order. (ECF No. 1368).

The Court has asked the parties to address the following: (1) Anticipated length of trial; (2) Anticipated number of witnesses; (3) status of paper copies of exhibits; and (3) Counsel's position as to the trial date.

1       Although Mr. Meehan understands and is aware of the current restraints  
2 due to the COVID-19 epidemic, on behalf of his client, he objects to a  
3 continuance and is requesting the trial date to remain as scheduled, August 17,  
4 2020. The assigned AUSA is aware of this Court's previous rulings and Orders  
5 as to other cases currently scheduled over the summer of 2020. Understanding  
6 that the Tri-Cities, WA area is still under Phase 1 restrictions, the assigned  
7 AUSA understands there is not an ability to call in a petit jury. Given the existing  
8 General Orders in place, this Court can exclude all time under the Speedy Trial  
9 Act due to the COVID-19 epidemic and move the current trial date. That appears  
10 to be the best and most practical course of action. Due to the backlog of trials  
11 and cases because of COVID-19, the United States requests a trial date in early  
12 November.

13       As to the length of trial, the parties agree that 13 days is reasonable,  
14 understanding that is not an exact estimate.

15       As to number of witnesses, the United States anticipates 30 to 35  
16 depending upon the nature of stipulations at the time of trial.

17       As far as trial exhibits, although most can be submitted electronically,  
18 numerous physical exhibits will need to be brought into Court. It is also the  
19 assigned AUSA's experience, that providing paper copies of exhibits is necessary  
20 for ease of presentation to counsel and the Court, as well as an ability to have a  
21 backup method of presentation should an issue arise with electronic presentation.  
22 As the Court is also aware, this case was prepared for trial previously; therefore,  
23 exhibit binders were previously provided to the Defendant and would involve

1 much of the same exhibits now for trial. Therefore, the parties believe paper  
2 exhibits should also be provided.

3 The parties believe that has addressed the Court's questions but can  
4 certainly provide more information if needed.  
5

6 DATED this 18<sup>th</sup> day of June, 2020.  
7

8 William D. Hyslop  
9 United States Attorney  
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12 s/*Stephanie Van Marter*  
13 Stephanie Van Marter  
14 Assistant United States Attorney  
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17 CERTIFICATION  
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19 I hereby certify that on 10th day of June 18, 2020, I electronically filed the  
20 foregoing with the Clerk of the Court using the CM/ECF System which will send  
21 notification of such filing to the following, and/or I hereby certify that I have  
22 mailed by United States Postal Service the document to the following non-  
23 CM/ECF participant(s):  
24

25 Shea Meehan: [smeehan@walkerheye.com](mailto:smeehan@walkerheye.com)  
26

27 s/*Stephanie J. Van Marter*  
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Stephanie Van Marter  
Assistant United States Attorney  
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